Irradiation Impacts - The DEIS fails to take into account the impacts if irradiation on plastics and other organic wastes, and the resultant secondary formation of hazardous waste and Hazardous Air Pollutants (HAPs), which could result in accidental releases during compaction and incineration. Such scenarios should be included in the analysis of the air quality and accident Sections, among others.

Upset/Malfunctions DOE does not adequately address or describe potential problems and emissions or releases from *upset*, or *malfunction events*, which may result in short-term high levels of emissions, and adverse impacts to worker safety (OSHA), and ambient air quality (NAAQS, NESHAPS & MACT limits). Incinerators historically show a propensity towards these malfunctions, arising from either maintenance, design limits, and uneven off-gas production.

Consequently additional questions/issues need to be addressed in the DEIS regarding the proposed AMWTP facility:

What would be the short-term air impacts in the event of exhaust fan failure?

How long would emissions continue from the stacks in the event of a "Fast Shutdown Procedure"? Short-term concentrations of criteria pollutants, HAPs, and radionuclides?

What would be the emissions in the event that the flue gas cooler failed, during maximum throughput conditions? And could such temperatures damage the downstream HEPA filter banks?

What would be the emissions in the event that the flue gas cooler failed, and the high temperature filters had partial filter failure?

In all of the above scenarios what would be the resultant *removal efficiency* impacts and any resulting compliance problems with TSCA.?

Please revise the various air quality sections of the EIS according to the above comments.

Inadequate review in the EIS of New Source Performance Standards
Although this Federal Law is referenced in the Table at E-3-4, no narrative is included to address compliance with this Clean Air Act requirement.

Idaho Stack Opacity standards - Existing air quality stack at NWCP (calciner) appears to exceed 20% opacity State standard during routine operations, and, according to State certified observers, would frequently exceed the State standard for exempted sources, which is 40% opacity. (See Section 625, State Air Quality Standards.) The Draft EIS does not address estimated direct stack opacity levels, which need to be assessed in order to determine if the opacity limit of the State standard would be violated (including periods of time during upset/startup and malfunction events). Please address both the problems of stack visibility